

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

In re:  
JACQUELINE MICHELLE LENNON

Case No. 13-74773-FJS  
Chapter 7

Debtor

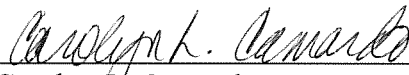
**MOTION TO COMPEL TURNOVER OF  
PROPERTY OF THE ESTATE**

Comes now Carolyn L. Camardo, Chapter 7 trustee (“Trustee”) for the estate of **JACQUELINE MICHELLE LENNON** (“Debtor”) and moves this Honorable Court to compel the Debtor to turnover property of the estate and in support thereof states as follows:

1. JACQUELINE MICHELLE LENNON (“Debtor”) filed a voluntary Chapter 7 petition on December 24, 2013.
2. Carolyn L. Camardo was appointed as interim trustee in this case and continues to serve in that capacity.
3. Among the assets of the estate is \$4,160.77 in non-exempt 2013 federal and state income tax refunds (the “Refunds”).
4. Pursuant to her statutory duty to liquidate property of the estate pursuant to 11 U.S.C. §704, the Trustee has made demand for turnover of the non-exempt Refunds in the amount of \$4,160.77.
5. The Debtor has not turned over the non-exempt assets despite demand made over 30 days ago.

Carolyn L. Camardo, Trustee VSB #23814  
5101 Cleveland Street, Suite 200  
Virginia Beach, VA 23462  
(757) 490-2200

WHEREFORE, Carolyn L. Camardo, Trustee, moves this Court for an order compelling the Debtor to turnover the non-exempt property of the estate in the amount of \$4,160.77, for \$500.00 in sanctions for having to file this Motion, and for such other and further relief as is just under the circumstances.

  
Carolyn L. Camardo, Trustee

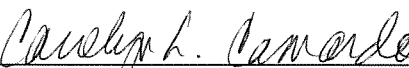
**CERTIFICATE OF SERVICE**

I certify that a true copy of the foregoing Motion to Compel Turnover was served by first class mail postage prepaid or via the Electronic Case Filing (ECF) system, as appropriate and as indicated on the following parties this March 24, 2014:

Office of the United States Trustee\*  
Federal Building, Room 625  
200 Granby Street  
Norfolk, Virginia 23510  
[USTPRegion04.NO.ECF@usdoj.com]

Kristi L. Johnson\*  
5055 Seminary Road #938  
Alexandria, VA 22311  
[kristiljohnson13@gmail.com]

Jacqueline Lennon  
404 S. Rosemont Road  
Virginia Beach, VA 23452

  
Carolyn L. Camardo

[\* Indicates service by ECF or e-mail. All others served by First Class U.S. Mail, postage prepaid.]

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

In re:	)
JACQUELINE MICHELLE LENNON	) Case No 13-74773-FJS
	) Chapter 7
Debtor	)
	)
Address: 404 S. Rosemont Road	)
Virginia Beach, VA 23452	)
Last four digits of Social Security: XXX-XX-0733	)

**NOTICE OF MOTION TO COMPEL DEBTOR TO TURNOVER PROPERTY**

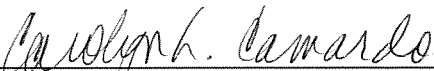
**PLEASE TAKE NOTICE THAT**, Carolyn L. Camardo, Chapter 7 trustee ("Trustee") of the estate of JACQUELINE MICHELLE LENNON ("Debtor"), filed a Motion to Compel Turnover of Property pursuant to 11 U.S.C. § 542 ("Motion"), requesting an order compelling the Debtor to turnover certain non-exempt assets.

**Your rights may be affected. You should read the Motion carefully and discuss it with our attorney. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to grant the relief requested in the Motion, then you or your attorney must attend a hearing to be scheduled at a later date. You will receive a separate notice of hearing.

Under Local Rule 9013-1, unless a written objection to the Motion is filed with and received by the Clerk of the Bankruptcy Court, U.S. Bankruptcy Court, Room 400, Walter B. Hoffman Courthouse, 600 Granby Street, Norfolk, VA 23510, and received by Carolyn L. Camardo, Trustee, 5101 Cleveland Street, Suite 200, Virginia Beach, VA., **on or before seven (7) days before the scheduled hearing date**, the Court may deem any opposition waived, treat the Motion as conceded, and enter an order granting the requested relief without further notice or hearing.

Dated: March 24, 2014

  
Carolyn L. Camardo, Trustee

Carolyn L Camardo, Trustee –VSB # 23814  
5101 Cleveland Street, Suite C  
Virginia Beach, VA 23462  
(757) 490-2200

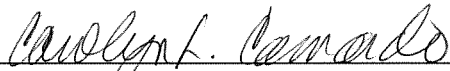
**CERTIFICATE OF SERVICE**

I certify that a true copy of the foregoing Notice of Motion to Compel Turnover of Property of the Estate was served by first class mail postage prepaid or via the Electronic Case Filing (ECF) system, as appropriate and as indicated on the following parties this March 24, 2014:

Office of the United States Trustee\*  
Federal Building, Room 625  
200 Granby Street  
Norfolk, Virginia 23510  
[USTPRegion04.NO.ECF@usdoj.com]

Kristi L. Johnson\*  
5055 Seminary Road #938  
Alexandria, VA 22311  
[kristiljohnson13@gmail.com]

Jacqueline Lennon  
404 S. Rosemont Road  
Virginia Beach, VA 23452

  
\_\_\_\_\_  
Carolyn L. Camardo, Trustee

[\* Indicates service by ECF or e-mail. All others served by First Class U.S. Mail, postage prepaid.]

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

In re:  
JACQUELINE MICHELLE LENNON

Case No. 13-74773-FJS  
Chapter 7

Debtor

**NOTICE OF HEARING**

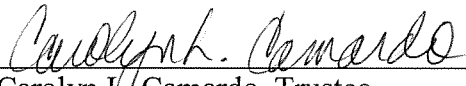
PLEASE TAKE NOTICE THAT Carolyn L. Camardo, Chapter 7 Trustee ("Trustee") of the estate of JACQUELINE MICHELLE LENNON ("Debtor"), filed a Motion to Compel Turnover of Property of the Estate (the "Motion").

**Your rights may be affected. You should read the Motion carefully and discuss it with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief requested in the Motion then you or your attorney must attend a hearing to be held on **May 6, 2014 at 10:00 AM** at Judge Santoro's Courtroom, 600 Granby Street, 4<sup>th</sup> Floor, Courtroom 2, Norfolk, Virginia.

Under Local Rule 9013-1, unless a written objection to the Motion is filed with and received by the Clerk of the Bankruptcy Court, U.S. Bankruptcy Court, 600 Granby Street, Room 400, Norfolk, VA 23510, and received by Carolyn L. Camardo, Trustee, 5101 Cleveland Street, Suite 200, Virginia Beach, VA 23462, on or before seven (7) days before the scheduled hearing date, the Court may deem any opposition waived, treat the Application as conceded, and enter an order granting the requested relief without further notice or hearing.

Dated: March 24, 2014

  
\_\_\_\_\_  
Carolyn L. Camardo, Trustee

Carolyn L. Camardo, Trustee VSB#23814  
5101 Cleveland Street, Suite 200  
Virginia Beach, Virginia 23462  
(757) 490-2200  
(757) 490-0280 facsimile

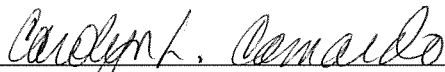
**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Notice of Hearing was served first-class mail postage prepaid or via the Electronic Case Filing (ECF)\* or by e-mail\* on March 24, 2014, to the following:

Office of the United States Trustee\*  
Federal Building, Room 625  
200 Granby Street  
Norfolk, Virginia 23510  
[USTPRegion04.NO.ECF@usdoj.com]

Kristi L. Johnson\*  
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